

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent : Jonathan Wickwire

Telephone: 313.268.0574

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

D-1 Tyquandre Harris,
D-2 Jaquandre Harris, and
D-3 Cyrhocia Ward

Case: 4:23-mj-30222

Assigned To : Ivy, Curtis, Jr

Assign. Date : 5/31/2023

Description: IN RE SEALED MATTER (kcm)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of January 1, 2020 to February 29, 2020, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 371

Offense Description

Conspiracy to deal in firearms without a license and to make false
statements during the acquisition of a firearm

18 U.S.C. § 1349

Wire fraud conspiracy

This criminal complaint is based on these facts:
Please see the attached affidavit.



Continued on the attached sheet.

*Complainant's signature*Jonathan Wickwire, Special Agent - ATF&E*Printed name and title*

Sworn to before me and signed in my presence.

Date: May 31, 2023*Judge's signature*City and state: Flint, MichiganCurtis Ivy, Jr., United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
United States v. Tyquandre Harris, Jaquandre Harris, and Cyrhoccia Ward

I, Jonathan Wickwire, being duly sworn, state the following:

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since November 2016. I am currently assigned to the Detroit, Michigan Field Division, Marquette Satellite Office, where I am tasked with investigating violations of firearms and narcotics laws. I have received formal training from the ATF National Academy and the Federal Law Enforcement Training Center regarding investigations involving the illegal possession of firearms, firearms trafficking offenses and drug trafficking offenses. Prior to my employment with ATF, I was employed by the Michigan Department of State Police (MSP) for approximately 12 years. I held numerous positions with MSP, including a two-year assignment as a Task Force Officer with ATF. I have investigated numerous incidents involving violations of state and federal firearms and narcotics laws.

2. This affidavit is based on my personal knowledge based on my participation in this investigation, information stemming from witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and

information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I am currently investigating Tyquandre Devonte Trayon Harris, Jaquandre Leemetree Denyaree Harris, and Cyrhocia Abryana Ward for the making false statements with respect to the purchase of a firearm, in violation of 18 U.S.C. § 922(a)(6), dealing firearms without a license in violation of 18 U.S.C. § 922(a)(1)(A), and wire fraud in violation of 18 U.S.C. § 1343. Based on information obtained during the investigation, I have probable cause that Tyquandre Harris, Jaquandre Harris, and Cyrhocia Ward conspired and agreed to commit these offenses in violation of 18 U.S.C. § 371 and 18 U.S.C. 1349. Overt acts in furtherance of the conspiracy are described in the paragraphs that follow.

4. During the last week of January 2020, I received information that individuals from Flint, Michigan were purchasing and attempting to purchase firearms parts and accessories from CBC Industries, Inc using stolen credit card information. Patricia Kenyon, a CBC representative advised that two orders were fulfilled prior to these orders being flagged as fraudulent. The orders being placed were for firearm parts kits, including AR upper build kits. Kenyon told me that the shipping addresses associated with these orders were 1517 Earlmoor Boulevard, 1101 Ossington, and 3805 Sunridge Drive, all of Flint, Michigan. Kenyon provided

me with a spreadsheet of orders placed using fraudulent credit card information.

5. I contacted two of the owners of the credit cards used for the purchases identified by CBC as fraudulent and was advised that they did not make the purchase or authorize another to use their card information to purchase firearm parts.

6. According to the CBC Industries website, “CBC Industries provides high quality AR-15 firearms, AR-15 upper receiver assemblies, lowers, parts, and accessories for the enthusiast as well as the small to the medium builder”.

7. CBC Industries is located in South Carolina. Based on my training and experience and discussions with other law enforcement officers, making a purchase over the internet causes a wire transmission to process the sale.

8. Based on the information provided by CBC Industries, I was able to determine that the internet provider used during some of the fraudulent orders was Comcast and that the subscriber was Halysian Harris of 1101 Ossington Avenue, Flint, Michigan. Therefore, I knew that some of the fraudulent purchases were made using that internet at this address.

9. The addresses of 1101 Ossington Avenue, Flint, Michigan and an address of 3805 Sunridge Drive, Flint, Michigan were identified as shipping addresses on the purchases made using the above internet account.

10. Using the email addresses, telephone numbers, and shipping addresses provided by CBC Industries, I was able to identify Tyquandre Harris and Jaquandre Harris as possible suspects involved with the fraudulent purchases. For example Jaquandre077@icloud.com was an email used; the telephone number 952-657-0448 associated with Jaquandre Harris was used; 810-824-2510 and the address of 3805 Sun Ridge Drive, Flint was used and law enforcement databases show this number and address associated with Tyquandre Harris.

11. Subscriber information for jaquandre077@icloud.com identified Jaquandre Harris of 3805 Sun Ridge Drive, Flint and telephone 810-875-4011 associated with the account. This telephone number was also used as a contact information for fraudulent purchases or attempt to purchase firearm parts from CBC industries.

12. While investigating the fraudulent purchase of firearms parts, I received information from Williams Gun Sight Inc, a federally firearms licensee, that a possible straw purchase had occurred involving three individuals. As set forth below I was able to identify the three individuals as Tyquandre Harris, Jaquandre Harris and Cyrhocia Ward.

13. I obtained copies of the ATF Form 4473's from Williams Gun Sight for firearms purchased by Tyquandre Harris, Jaquandre Harris and Cyrhoccia Ward. The ATF Form 4473's indicated that on January 25, 2020, Jaquandre Harris purchased two Anderson Manufacturing AM-15 receivers with serial numbers 19316188 and 19309691. During this purchases Jaquandre Harris provided an address of 3805 Sunridge Drive, Flint, Michigan, and a telephone number of 952-657-0448, which both were previously identified as being used during the fraudulent purchases and attempts with CBC Industries.

14. The ATF Form 4473's received from Williams Gun Sight also indicated that on January 25, 2020 Cyrhoccia Ward purchased four (4) Anderson Manufacturing AM-15 receivers. Ward purchased (4) more Anderson Manufacturing receivers two days later on January 27, 2020.

15. Brian Williams of Williams Gun Sight provided a store surveillance photograph of the three individuals inside Williams Gun Sight Company making one of the purchases. Based on comparison of Michigan Driver License photographs, I identified the individuals as Cyrhoccia Ward, Jaquandre Harris, and Tyquandre Harris.

16. Brian Williams told me that during this time one salesmen stopped selling firearms to Jaquandre Harris because of the quantity of receivers he was buying was unusual. Based on my review of the 4473s received from Williams Gun

Sight it was shortly thereafter that Ward began purchasing receivers.

17. On February 3, 2020, I obtained information from Industry Operations Investigator John Murphy about Adams Gun Shop located at 3027 Linden Road, Flint, Michigan having dealings with individuals purchasing AR lower receivers. I then made contact with Hamad Awad the owner of Adams Gun Shop via telephone. Awad informed me that two individuals, he believed to be brother and sister, had purchased numerous AR receivers, and these purchases seemed suspicious. Awad informed me that one of the individuals was currently in the shop attempting to purchase additional receivers.

18. On February 3, 2020, at approximately 3:10 pm, ATF agents established surveillance at Adams Gun Shop. I observed a red GMC Sierra pickup truck parked in the parking lot of Adams Gun Shop bearing Michigan Registration Plate "EEL4187". A query of the registration plate through the Law Enforcement Information Network indicated the vehicle was registered to Tyquandre Devonte-Trayon Harris of 1101 Ossington Avenue, Flint, Michigan. ATF agents then established surveillance near 1101 Ossington Avenue.

19. While conducting surveillance, I spoke with Awad on the telephone who advised Tyquandre Harris wanted additional receivers, but Harris told Awad that his sister was going to purchase them. At approximately 4:12 pm, I observed Tyquandre Harris exit Adams Gun Shop and enter the red GMC pickup. He was the

sole occupant of the vehicle. The vehicle was surveilled to the Walnut Square Apartments, where it parked in front of unit numbers 1440-1454 on Walnut View, Flint, Michigan. A few moments after parking, Cyrhocia Ward was observed exiting the building and entering the passenger seat of the red GMC pickup.

20. Agents then surveilled the red GMC pickup back to Adams Gun Shop where Tyquandre Harris and Ward entered the shop. While inside the shop, I contacted Awad who advised the two individuals were trying to purchase additional receivers. Awad declined to sell the receivers to the individuals. At approximately 4:41 pm, Tyquandre Harris and Ward left the location in the red GMC pickup and were surveilled to Tiger Auto Salvage located at 3193 E. Bristol Road, Burton, Michigan. Tyquandre Harris was observed entering the business for a few moments and returning to the red GMC pickup. The individuals were then observed traveling back to the location where Ward was picked up. She exited the vehicle and entered the apartment. Tyquandre Harris was then observed leaving the apartments and was surveilled back to his residence of 1101 Ossington Avenue, Flint, Michigan.

21. On February 4, 2020, Special Agent Nathan Sutara and I responded to Adams Gun Shop and spoke with Awad about these individuals. We asked Awad for additional information regarding Tyquandre Harris, Jaquandre Harris, and Ward. We also requested copies of ATF Form 4473's for any purchases involving the three individuals.

22. Awad informed me that Tyquandre Harris and Ward were previously in the store on three different occasions and purchased receivers. A review of the 4473's show that the purchases began in January 2020 and continued until the end of February 2020. Awad informed me that Tyquandre Harris came into the store with Ward and Tyquandre talked about purchasing the receivers. When the purchase took place, Ward completed the ATF Form 4473's to purchase the receivers. Awad stated that Tyquandre Harris asked for an exchange of one of the lowers during one of the transactions. Awad said that Tyquandre Harris told him he sold a completed firearm to an individual for \$600 and the receiver broke. Awad asked Tyquandre Harris to bring it into the store so it could be replaced, and Tyquandre Harris told Awad he could not because the person he sold it to scratched off the serial number. Awad also told the agents that shortly after selling the individuals the receivers that Tyquandre Harris returned to the store with three to four complete firearms he told Awad he built and requested Awad purchase the items. Awad refused to purchase the completed firearms.

23. Awad also informed the agents that Jaquandre Harris had traded a complete AR pistol for more receivers. He provided the agents with a Michigan Pistol Sales Record that indicated the firearm was a 5.56 caliber Anderson Manufacturing, AM-15, with serial number 19316197. Awad advised this trade occurred on January 23, 2020.

24. Upon review of ATF Form 4473's, I determined that Jaquandre Harris purchased the above Anderson Manufacturing receiver on January 20, 2020, at Williams Gun Sight Company. Three days later the receiver was made into a complete firearm and traded for additional receivers.

25. Between the beginning of January 2020 and the end of February 2020, Jaquandre Harris, Tyquandre Harris and Cyrhoccia Warrd purchased forty-four (44) receivers. This was confirmed by reviewing ATF Form 4473's received from Adam's Gun Shop and Williams Gunsight Company.

26. Based on the information provided by Patricia Kenyon of CBC Industries and review of the ATF Form 4473's, addresses and telephone numbers provided during some of the fraudulent transactions with CBC Industries matched the addresses and telephone numbers provided on the ATF Form 4473's.

27. I have identified that the receivers were purchased from two federal firearms licensee (FFL), Adams Gun Shop and Williams Gunsight Company. I also identified that AR built kits were purchased from one internet site, CBC Industries. Additional receivers and parts kits may have been purchased from other FFL's or internet sites that have not been identified.

28. All of the receivers were purchased with cash. The receivers cost approximately \$79.95 per receiver. The fraudulent purchases and attempted purchases from CBC Industries Inc. were for AR15 Pistol and AR Rifle build kits.

The kits range in price from \$200 to \$400 per unit.

29. I know based on my training and experience that a completed AR type pistol or rifle can be sold for between \$400 and \$1200 depending on manufacturer. Therefore, if someone was buying receivers for \$79 dollars and fraudulently obtaining the remaining parts, they could profit significantly by selling completed firearms. I also know that is it uncommon for an individual to purchase numerous firearms of the same make and model for personal use. The activity displayed by the Tyquandre Harris, Jaquandre Harris, and Ward is indicative of firearms trafficking and dealing in firearms without a license.

30. On February 21, 2020, federal search warrants were executed at several locations associated with this investigation. One of those locations was 1101 Ossington Avenue, Flint, Michigan. Tyquandre Harris and Jaquandre Harris as well as others, were in the residence at the time of the search.

31. While searching the residence, numerous AR receivers were located along with firearm parts kits. A credit card skimmer was located in Tyquandre Harris's vehicle which was parked on the premises. Several gift cards were seized. I know based on my training and experience that gift cards can be used in combination with a skimmer to counterfeit a credit card using stolen credit card account or bank account information obtained from the dark web.

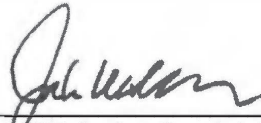
32. During an interview of Jaquandre Harris, he admitted that he was selling completed firearms to pawn shops and people on the street. He could not confirm exact locations, or names of people. He also advised that Cyrhoccia Ward, who he identified as “Ro” would buy firearms for him after Williams Gun Sight Company stopped selling to him. Tyquandre Harris was also interviewed and did not provide any information. Both individuals admitted to being daily users of marijuana.

33. On September 1, 2020, Special Agent Nathan Sutra and I conducted an interview with Cyrhoccia Ward at her residence. She admitted to buying firearms. She informed us that she no longer had the firearms and indicated they were stolen. She told us that the firearms were reported stolen through Flint Police Department. Ward denied knowing Tyquandre Harris and Jaquandre Harris.

34. I contacted the Flint Police Department and there were no stolen firearm reports associated to Cyrhoccia Ward. I also queried the receivers that Ward purchased using the Law Enforcement Information Network and none of them were reported stolen.

35. I know based on my training and experience, that individuals who make straw purchases will commonly say the firearms were stolen or lost when questioned about the firearms whereabouts. This is done to separate themselves from the firearms and any liability if the firearm was used during the commission of a crime.

36. Based on all of the above information, I have probable cause to believe that Tyquandre Harris, Jaquandre Harris, and Cyrhocia Ward conspired and agreed with each other to falsify statements during the purchase of a firearm [18 U.S.C. § 922(a)(6)], to deal In firearms without a license [18 U.S.C. § 922(a)(1)(A)] and wire fraud [18 U.S.C. § 1343] all in violation of 18 U.S.C. § § 371 and 1349.



Jonathan Wickwire, Affiant
Special Agent, ATF

Sworn to before me and signed in my presence and/or by reliable electronic means.

Date: May 31, 2023



CURTIS IVY, JR.
United States Magistrate Judge